

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RAMIRO FELIX GONZALES, §
Plaintiff, §
v. § CIVIL ACTION NO. 4:21-CV-00828
§
BRYAN COLLIER, Executive Director §
of the Texas Department of Criminal §
Justice, BOBBY LUMPKIN, Director §
of the Texas Department of Criminal §
Justice–Correctional Institutions §
Division, and DENNIS CROWLEY, §
Warden of the Huntsville Unit, §
Defendants. §

Joint Status Update Regarding Litigation

On August 10, 2022, the parties jointly notified the Court that they were engaged in negotiations to resolve all remaining issues in the case. The parties have continued active discussions and believe a final resolution is likely to be agreed upon without the necessity of additional litigation. Plaintiff's counsel is scheduled to meet with Mr. Gonzales on September 15, 2022, at which point a decision may be made as to whether all parties are in agreement.

Accordingly, the parties respectfully request an additional 14 days to notify the Court of the next step in this litigation. By September 23, 2022, the parties will notify the Court of whether there remains any unresolved issue, and what remaining motions may need to be filed.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE
Division Chief
Law Enforcement Defense Division

/s/ Leah O'Leary
LEAH O'LEARY
Assistant Attorney General
Attorney-in-Charge
State Bar No. 24079074
Southern District No. 1563191
Leah.Oleary@oag.texas.gov

Law Enforcement Defense Division
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548
Austin, Texas 78711-2548
(512) 463-2080 / Fax (512) 370-9918

ATTORNEYS FOR DEFENDANTS
COLLIER, LUMPKIN, AND CROWLEY

/s/ Jeremy Schepers
JEREMY SCHEPERS (TX 24084578)
Supervisor, Capital Habeas Unit

JASON D. HAWKINS
Federal Public Defender

MICHAEL KAWI
Assistant Federal Public Defender

VICTORIA INOJOSA
Research and Writing Attorney

Office of the Federal Public Defender
Northern District of Texas
525 S. Griffin St., Ste. 629
Dallas, TX 75202
(214) 767-2746
jeremy_schepers@fd.org

STEVEN T. COLLIS (TX 24122632)
Director, Law & Religion Clinic
University of Texas School of Law
727 E. Dean Keaton St.
Austin, TX 78705
(512) 475-9090
steven.collis@law.utexas.edu

COUNSEL FOR PLAINTIFF GONZALES

CERTIFICATE OF SERVICE AND ELECTRONIC FILING

I, **LEAH O'LEARY**, hereby certify that on September 9, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States Court for the Southern District of Texas using the electronic case-filing (ECF) system of the Court, which electronically serves all counsel of record and registered users in this case.

/s/ Leah O'Leary
LEAH O'LEARY
Assistant Attorney General